

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: John C. Yasch)	Case Number: 17-16712
Toni K. Yasch)	Chapter 13 Proceedings
Debtor)	Judge Arthur I. Harris

TRUSTEE’S OBJECTION TO MOTION TO MODIFY UNCONFIRMED PLAN

Now comes LAUREN A. HELBLING, the duly appointed, qualified, and standing Chapter 13 Trustee (the “Trustee”) herein, by and through counsel, and hereby files this objection to the motion to modify the unconfirmed plan of the Debtors filed on or about May 8, 2018. In support of her objection the Trustee makes the following representations to the Court:

1. The Trustee objects to the Debtors’ motion for the following reasons:
 - a. The Debtors’ projected disposable income, as stated on line 45 of the amended Form 122C-2 filed May 8, 2018, is \$1,373.50, and as a result at least \$82,410.00 must be offered to unsecured creditors in order to satisfy the “projected disposable income” test of §1325 of the Bankruptcy Code. As the proposed plan only offers \$51,858.00 to unsecured creditors, it does not satisfy the “projected disposable income” test and it should not be confirmed.
2. The Trustee reserves the right to amend and/or supplement her objection, should additional information be provided.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to sustain her objection and deny the motion of the Debtors for the reasons cited.

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844)
Attorney for Lauren A. Helbling,
Chapter 13 Trustee
200 Public Square, Suite 3860
Cleveland, OH 44114-2321
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CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2018, a true and correct copy of Trustee's Objection Unconfirmed Modified Plan was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

William J. Balena, on behalf of John and Toni Yasch, Debtors, at docket@ohbksource.com

And by regular U.S. mail, postage prepaid, on:

John and Toni Yasch, Debtors, at 13407 Sherry Avenue, Cleveland, OH 44135

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844)

LAH/pl
5/31/18